

February 21, 2019

Sent via email
Charles Spagnoli, Esq.
6575 Kirkville Road
East Syracuse, NY 13057

Re: Spero v. VSCD et al.
Civil Action No.: 3:17-cv-00007

Dear Charles:

I'd like to address and follow up on a number of issues that have arisen during the depositions we've completed thus far.

Deposition Schedule and Additional Depositions

I've confirmed that Deborah Spero and Brittany Spero can both be in attendance on March 6, 2019 at your office in Syracuse, NY.

I've confirmed that March 26, 2019 will work for my calendar for Superintendent Ahearn's adjourned deposition. That will be commencing at 10:00 a.m. at our office in Binghamton, NY.

I spoke with Vincent about his additional deposition scheduled for March 21, 2019. He indicates that he has class until 11:50 a.m. so I would request that you begin his at 12:15 and end no later than 1:15 so we can start Mr. Kasson's promptly at 1:30 that day.

I am providing you with additional days that I am available in March as it looks like we will need to do at least one if not two more short depositions. Based off the testimony of Ms. Caddick we also plan to depose Assistant Superintendent Lorraine Posture. I am available on the following dates: March 7, 11, 12, 14, 15, 18, 19, 20, 25, 27, 29th. Please advise on which dates work for the Assistant Superintendent. I have enclosed the notice of deposition for Ms. Posture.

Production Requests From Depositions

What follows is a list of the items we've requested of your witnesses during their respective depositions. I'd appreciate if you could provide these documents at

the earliest date possible. There may be additional items that were requested, but we will have to check the official transcript once those are received.

Dr. Penna Deposition

1. Official record of the date and time of every lock-down drill for the 2016-2017 school year.

Deborah Caddick Deposition

2. All Dignity for All Student's Act (DASA) reports filled out by Ms. Caddick in which the student said any derivation of the word "nigger".
3. All Hearing Officer recommendations and Superintendent Decisions for the incident referenced by Ms. Caddick in which a fireman was displayed at an out of school party.
4. The list referenced by Ms. Caddick that sets forth the disciplinary "offense codes" and corresponding "offense code" description.
5. All emails, or calendar notices, concerning monthly administration meetings for 2016-2017 school year.
6. Meeting minutes from the December 8, 2016 administration meeting referenced by Ms Caddick.
7. DASA report (if any) for 10/13/15 incident on Vincent's disciplinary record for reporting students use the N word and harassment of a student who wears a turban.
8. Tally of responses to the 10 investigation questions which was then used to present the results of the investigation to Dr. Penna and/or Superintendent Ahearn.

Vincent Spero Requests

After a diligent search and a reasonable inquiry, Vincent does not have in his custody or control the Snapchat video of a "girl in the hospital" or the photo of Vincent in the vicinity of another student's truck.

Thank you for your attention to these matters. Please ensure that any correspondence related to the Vincent Spero matter is copied to both Josh Cotter and Susan Young from here on out as I will be on vacation from February 16-26th.

Sincerely,

S/Willa S. Payne
Legal Services of Central New York, Inc.